

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

WILLIAM P. CHERNICOFF,)
Plaintiff,) CIVIL ACTION NO. 04-10073NG
v.)
NCO FINANCIAL SYSTEMS, INC.,)
LOVELACE HEALTH SYSTEMS,)
EQUIFAX INFORMATION)
SERVICES, LLC, BIRCHWOOD)
CREDIT SERVICES, INC., TRANS)
UNION CORPORATION, and)
EXPERIAN NATIONAL ASSISTANCE)
CENTER,)
Defendants.)

COMES NOW Defendant Equifax Information Services L.L.C., (“Equifax”), by counsel and for and pursuant to Fed. R. Civ. P. 26(a)(1), makes the following initial disclosures:

A. Individuals likely to have discoverable information:

Response:

At this early stage, Equifax has not yet discovered all individuals who may have discoverable, non-privileged knowledge concerning significant factual issues in this case. To date, Equifax has identified the following:

- (i) Plaintiff - knowledge as to the facts alleged in the case.
- (ii) A representative of Equifax Information Services LLC's Office of Consumer Affairs

This person will have information regarding the procedures used by Equifax Information Services Consumer Affairs employees in dealing

with affiliate-owned files and, after reviewing relevant documents, the facts at issue in this case regarding plaintiffs' disputes of information on their credit reports. This person may be contacted through Equifax's counsel of record.

- (iii) Any expert or fact witness identified by any other party, including but not limited to representatives of any creditors who have allegedly denied credit to Plaintiff.

Equifax reserves the right to supplement its response to this disclosure.

B. Documents

Response:

Equifax has identified the following documents in its possession that are relevant to the facts alleged with particularity in the Complaint:

- Consumer dispute reinvestigation documents for case 229515505 dated November 4, 2002. (EIS 000001 – EIS –000004)
- Correspondence from Jason & Fischer dated December 30, 2002 to Equifax (EIS 000005 – EIS 000008)
- Consumer Dispute Verification Form to GMAC associated with case 229515505 (EIS 000009)
- Consumer Dispute Verification Form to Sandia Labs associated with case 301417623 (EIS 000010)
- Consumer Dispute Verification Form to AFSA Data Corporation associated with case 301417623 (EIS 000011)
- Consumer Dispute Investigation Results dated February 14, 2003 (EIS 000012 – EIS 000017)

C. Damages

Response:

Equifax Information Services LLC is not seeking damages at this time but reserves the right to do so.

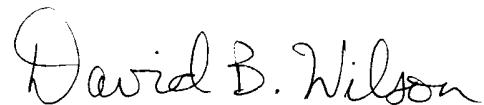
D. Insurance

Response:

Equifax Information Services LLC is self-insured for the amounts relevant to this matter.

Respectfully submitted,

***EQUIFAX INFORMATION
SERVICES LLC, by its attorneys,***



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DATED: May 13, 2004

Of Counsel:
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CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2004, I caused a true and correct copy of the foregoing to be served by U.S. mail, postage prepaid, addressed as follows:

Andrew M. Fischer, Esq.
Jason & Fischer
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Boston, MA 02108

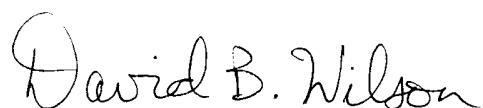
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Signed under the penalties of perjury on May 13, 2004.



David B. Wilson